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IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

VANESSA D. MILLER,

)

Plaintiff,

)

vs.

Case No.

THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY,

)

Defendant.

)

CJ

2012-1632

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

MAR 15 2012

PATRICIA PRESLEY, COURT CLERK
by _____ DEPUTYPETITION

COMES NOW the Plaintiff, Vanessa D. Miller, and for her cause of action against the Defendant, The Lincoln National Life Insurance Company, alleges and states as follows:

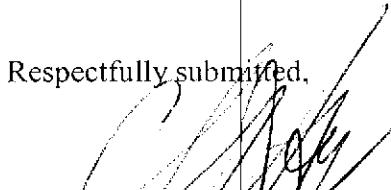
1. Plaintiff is a resident of Oklahoma County; Defendant is an insurance company doing business in the State of Oklahoma; this Court has proper jurisdiction and venue over this matter.
2. Plaintiff was employed by The State of Oklahoma and purchased life insurance with the Defendant herein, Policy No. 00086005715300000. Plaintiff has paid premiums on said policy continuously for many years.
3. Ms. Miller suffered a serious injury and has been disabled since August, 2009. Despite many demands by Ms. Miller for the Defendant to pay the premiums due to her disability, they have refused and failed to do so. Ms. Miller cannot afford to pay the premiums any longer and will lose her life benefits as a result of the breach of contract by this Defendant.
4. The life insurance policy clearly provides that the life insurance will continue for the insured, i.e., Vanessa Miller, without payment of premiums, if she becomes totally

totally disabled while insured under the policy before reaching the age of 60, among other obligations that Plaintiff has fully met. Despite the fact Ms. Miller receives 100% disability benefits, the Defendant refuses to pay her premiums and refuses to pay any life benefits to her beneficiaries.

5. As a direct result of the breach of contract by this Defendant and their failure to act in good faith and fair dealing, the Plaintiff herein is entitled to bad faith and punitive damages against the Defendant. Defendant's actions, based upon their intentional neglect towards their insured, is with gross and malice conduct and has affected the Plaintiff's life benefits.

WHEREFORE, Plaintiff, Vanessa D. Miller, seeks damages against the Defendant, The Lincoln National Life Insurance Company, in excess of \$75,000.00, for compensatory damages, and breach of contract; in excess of \$75,000.00 for bad faith; and in excess of \$75,000.00, for punitive damages, plus attorney fees, courts costs, interest, and all other relief the Court deems just and equitable.

Respectfully submitted,


Chris Harper, OBA #10325
Phillip P. Owens II, OBA #15165
CHRIS HARPER, INC.
P.O. Box 5888
Edmond, OK 73083-5888
Telephone: (405) 359-0600
Facsimile: (405) 340-1973
charper@chrisharperlaw.com
Attorneys for Plaintiff

ATTORNEY LIEN CLAIMED